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4 *Attorneys for Defendants Christopher*
Whited and Patterson Dental Supply, Inc.

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7   UNITED STATES DISTRICT COURT
              EASTERN DISTRICT OF WASHINGTON
8   AT RICHLAND

9 LAURA J. WILLIAMSON,   No. 4:19-cv-05176

10   Plaintiff,   DECLARATION OF LAURA E.
                                     KRUSE IN SUPPORT OF NOTICE
11   vs.   OF REMOVAL OF CIVIL ACTION
                                     UNDER 28 U.S.C. §1441(A)
12 CHRISTOPHER WHITED,
PATTERSON DENTAL SUPPLY,   **(REMOVED FROM**
13 INC.,   **WALLA WALLA COUNTY**
                                     SUPERIOR COURT
14   Defendants.   **CAUSE NO. 19-2-00398-36)**

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16   I, Laura E. Kruse, declare as follows:

17   1.   I am over eighteen (18) years of age and am competent to testify to the

18 matters contained in this declaration. I am an attorney for Defendants Christopher

19 Whited and Patterson Dental Supply, Inc. I submit this Declaration and the

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DECLARATION OF LAURA E. KRUSE IN SUPPORT OF NOTICE OF
REMOVAL OF CIVIL ACTION UNDER 28 U.S.C. §1441(A) – PAGE 1
CAUSE NO. 4:19-CV-05176

FORSBERG & UMLAUF, P.S.
ATTORNEYS AT LAW
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SEATTLE, WASHINGTON 98164
(206) 689-8500 • (206) 689-8501 FAX

2401800 / 3638.0001

1   attached Exhibits in support of Defendants' Notice of Removal of the Plaintiff's

2   state court action to this Court under 28 U.S.C. §§ 1332, 1441 and 1446, *et seq.*

3   2.   Attached hereto as **Exhibit 1** is a true and correct copy of the Proof of

4   Service on Patterson Dental Supply, Inc. showing a service date of June 4, 2019.

5   3.   Attached hereto as **Exhibit 2** is a true and correct copy of redacted

6   billing records from one of plaintiff's medical providers, Harborview Medical

7   Center, totaling $214,048.31.   The final total of bills from Harborview likely

8   exceeds that amount, and combined with bills from other medical providers, shows

9   the amount in controversy exceeds $75,000.

10   4.   Attached hereto as **Exhibit 3** is a true and correct copy of the

11 Corporate Registration information showing Patterson Dental Supply, Inc.

12 maintains its corporate headquarters in St. Paul, Minnesota.

13   5.   Attached hereto as **Exhibit 4** is a true and correct copy of the

14 Complaint showing plaintiff is a resident of Washington and defendant Christopher

15 Whited is a resident of Idaho.

16   6.   Defendant has paid to the Clerk of Court for the Eastern District of

17 Washington, the $400.00 filing fee required by law.

18   7.   Attached as **Exhibit 5** are true and correct copies of all documents

19 filed in this matter in Walla Walla County Superior Court.

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DECLARATION OF LAURA E. KRUSE IN SUPPORT OF NOTICE OF
REMOVAL OF CIVIL ACTION UNDER 28 U.S.C. §1441(A) – PAGE 2
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1   I declare under penalty of perjury under the laws of the United States and the

2   State of Washington that the foregoing is true and correct.

3   SIGNED this 2nd day of July, 2019 at Seattle, Washington.

4

5   FORSBERG & UMLAUF, P.S.

6   By: *s/ Laura E. Kruse*
        Laura E. Kruse, WSBA #32947

7   FORSBERG & UMLAUF, P.S.
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        Seattle, WA 98164

8   Tel: 206-689-8500
        Fax: 206-689-8501

9   E-mail: LKruse@FoUm.law
        Attorneys for Defendants Christopher Whited

10   *and Patterson Dental Supply, Inc.*

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DECLARATION OF LAURA E. KRUSE IN SUPPORT OF NOTICE OF
REMOVAL OF CIVIL ACTION UNDER 28 U.S.C. §1441(A) – PAGE 3
CAUSE NO. 4:19-CV-05176

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CERTIFICATE OF SERVICE

2   The undersigned certifies under the penalty of perjury under the laws of the

3 State of Washington that I am now and at all times herein mentioned, a citizen of

4 the United States, a resident of the State of Washington, over the age of eighteen

5 years, not a party to or interested in the above-entitled action, and competent to be

6 a witness herein.

7   On the date given below I caused to be served the foregoing

8 *DECLARATION OF LAURA E. KRUSE IN SUPPORT OF NOTICE OF*

9 *REMOVAL OF CIVIL ACTION UNDER 28 U.S.C. §1441(A)* on the following

10 individuals in the manner indicated:

11 Bradley Johnson
    Bradley Johnson Lawyers
12 1333 Stewart Street
    Seattle, WA 98109
13 (X) Via Hand Delivery
    (X) Via E-Mail

14

15   **SIGNED** this 2nd day of July, 2019, at Seattle, Washington.

16

17   *s/ Honor M. McQueen*
                          Honor M. McQueen

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DECLARATION OF LAURA E. KRUSE IN SUPPORT OF NOTICE OF
REMOVAL OF CIVIL ACTION UNDER 28 U.S.C. §1441(A) – PAGE 4
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